

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JOSE S. GARZA,
Plaintiff

v.

NATIONAL OILWELL VARCO, LP,
Defendant

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CA: H-4:12-cv-03532
Jury

PLAINTIFF'S REQUESTED VOIR DIRE

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff, by his attorney, submits the following list of questions to be asked prospective jurors in accordance with Federal Rule of Civil Procedure 47(a).

A. Personal Background

1. What is your name, address, and date of birth?
2. What type of work do you do?
3. Who is your employer?
4. In what line of business is that company?
5. How long have you been employed at that company?
6. Have you been employed by other companies?
7. What are they?
8. How long were you employed by each company and in what position?
9. Are you married?
10. Do you have a family?
11. What is your educational background and dates of graduation?
12. Do you now or have you ever possessed a license to sell insurance?
13. If so, which license(s) do you hold and when did you obtain it (them)?
14. Have any of you ever been arrested, charged with or convicted of any crimes? If so, please describe the incident(s) and disposition thereof?

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15. Have you served any time in the penitentiary?

16. Have your civil rights been restored?

B. Relationships with the Parties and their Attorneys

17. Have you, your family or close friends had any business or social relations with Defendant's attorney, other attorneys at their law firm?

18. Have you, your family, or close friends had any business or social relations with Plaintiff's attorney?

19. Have you, your family or close friends had any business or social relations with Plaintiff himself?

20. Have you, a family member or close friends been employed by the Defendant? If so, when?

C. Involvement in Prior Lawsuits

21. Have you, a family member or close friend been involved in a lawsuit, either as a party or a witness?

22. If so, what was the lawsuit about, what was the nature of your involvement, and how was the lawsuit resolved?

23. Have you, a family member or close friend been sued by or sued an insurance company?

24. If so, what was the lawsuit about, what was the nature of your involvement, and how was the lawsuit resolved?

25. If so, what kind of proceeding, and what was the nature of your involvement?

26. Have you ever served as a juror before?

27. If so, what kind of case?

28. Do you believe that people should not sue to protect their civil rights?

29. Do you believe that our society is experiencing a lawsuit abuse?

30. If so, why?

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31. Should society abolish the legal profession to do away with lawsuits?
32. Should society abolish laws to do away with lawsuits?
33. Should society abolish legislation which protects employees from discrimination?
34. Should discrimination in the work place be allowed/disallowed?
35. Should employment legislation be abolished to stop government interference in private business?
36. Have any of you filed EEOC charges of discrimination? If so, when, for what reason, and against whom?
37. Have any of you been involved in employment lawsuits? If so, when, for what reason, against whom, and what was the outcome?
38. Are any of you business owners? If so, have any of you been sued, or the object of claims, such as EEOC claims, workers' compensation claims, FLSA (Department of Labor) claims, OSHA investigations?

D. Questions Concerning the Specific Nature of the Case?

39. Is there anything about the nature of this case or the parties involved that would make you not want to sit on this jury?

Respectfully submitted,

BY: 

Peter Costea

TBN 04855900

Three Riverway, Suite 1800

Houston, Texas 77056

Tel. 713/337-4304

Fax 713/659-5302

ATTORNEY FOR PLAINTIFF

JOSE S. GARZA

CERTIFICATE OF SERVICE

I certify that on July 11, 2014 a true and correct copy of the foregoing pleading was served electronically by the clerk of the court on counsel for the Defendant, Mr. Jacob Credeur, Ogletree, Deakins, Nash, Smoak & Stewart, P.C., One Shell Square, 701 Poydras Street, Suite 3500, New Orleans, Louisiana 70139.



Peter Costea